



U.S. Department of Justice

United States Attorney  
Southern District of New York

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

July 8, 2022

**BY EMAIL & ECF**

The Honorable P. Kevin Castel  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: United States v. Juan Orlando Hernandez, a/k/a "JOH," S7 15 Cr. 379 (PKC)**

Dear Judge Castel:

The Government respectfully writes, pursuant to the Court's oral order of May 10, 2022, to provide an update on the status of any classified discovery and motion practice in this case. *See* Dkt. 432. In consultation with relevant components of the U.S. Government and the Department of Justice, the Government believes it will be in a position to file a motion pursuant to Section 4 of the Classified Information Procedures Act ("CIPA") by November 14, 2022. Accordingly, the Government requests a deadline of November 14, 2022. The Government has also been assisting in the coordination of defense counsel's application for clearance to review classified materials, which is in progress.

Should the Court have any questions about the anticipated scope or substance of the Government's Section 4 motion, the Government is available at the Court's convenience for an *ex parte* CIPA Section 2 conference.

Respectfully submitted,

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Southern District of New York

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cc: Defense Counsel (by ECF)